

**Commonwealth of Kentucky  
Division for Air Quality**

***RESPONSE TO COMMENTS***

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-07-004

Ticona Polymers, Inc.

Florence, KY 41042

August 6, 2007

Ralph Gosney, Reviewer

SOURCE ID: 021-015-00043

AGENCY INTEREST #: 259

ACTIVITY ID: APE20060001

**SOURCE DESCRIPTION:**

Ticona Polymers, Inc. compounds plastic resins, which consists of mixing of additives and chemicals with a raw polymer resin to impart different physical and chemical properties. Primary emission units include tote loading stations, Henschel mixers, and extrusion. Insignificant activities primarily consist of material and product handling activities. The Standard Industrial Classification (SIC) Code for this source is 3087, *Custom Compounding of Purchased Plastics Resins*.

**PUBLIC AND U.S. EPA REVIEW:**

On July 5, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Boone County Recorder* in Florence, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Ticona Polymers, Inc. on July 27, 2007. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

# ATTACHMENT A

## Response to Comments

Comments on Ticona Polymers, Inc. Draft Conditional Major Air Quality Permit submitted by Rich Fluharty, EHS Leader.

### **Conditional Major Permit**

1. Section B, paragraph 2.a. – We suggest that the wording “from the each stack from each EP 001 and 002” be revised to read “from each stack represented by EP 001 and 002”.

*Division’s response: Comment acknowledged, change made.*

2. Section B on page 5 includes a parenthetical phrase that could be misinterpreted – We suggest that the wording “(up to two feeders used during transfer)” be revised to read “(up to two fiberglass feeders used during transfer) in the descriptions for 004a (P004a), 004b (P004b), and 004c (P004c) on this page.

*Division’s response: Comment acknowledged, change made.*

3. Section B on page 6 - The description for 015 (P015) does not accurately reflect the operating limitations on this new extruder. We believe that a more appropriately worded description for this extruder would be the following, which better describes the inherent limits on the materials processed in this extruder that we included in the permit application: “70 mm Mega Twin Extruder extrudes polymer chips with additives that do not contain metallic HAPs. ~~This extruder is not fed from EP 001. Fortron and Vectra products will only be extruded at MS 2001.~~ Materials extruded through extruder MS 2001 are not processed in or fed from emission sources in EP 001, 013a, 013b, 013c, 013d, 016, 017 and 018.”

*Division’s response: Comment acknowledged, change made.*

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.